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July 16, 2021

**VIA ECF**

Hon. Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *SEC v. Ripple Labs Inc. et al.*, No. 20-cv-10832 (AT)(SN) (S.D.N.Y.)

Dear Judge Netburn:

We write jointly on behalf of Plaintiff Securities and Exchange Commission, and Defendants Ripple Labs, Inc., Bradley Garlinghouse, and Christian A. Larsen.

At your direction, the parties met and conferred this morning on the privilege issues that arose during yesterday's hearing on the motion to quash the deposition of William Hinman. Based on this morning's discussions, we have agreed to adjourn the July 19, 2021 deposition of Mr. Hinman, and have rescheduled the deposition for July 27, 2021.

The parties have made substantial progress in narrowing and resolving the privilege issues, and plan to have additional meet and confer discussions in the next few days to further narrow and resolve the issues relating to Mr. Hinman's deposition, without waiver of any party's rights, including any rights under Fed. R. Civ. P. 72(b)(2).

With the Court's permission, we propose to notify the Court by 5:00 p.m. on Monday, July 19, 2021 as to the status of our discussions and, if further judicial intervention is necessary, to propose a briefing schedule to resolve any outstanding issues.

Hon. Sarah Netburn

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Respectfully submitted,

/s/ Jorge G. Tenreiro

Jorge G. Tenreiro

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